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August 26, 2024

Via CM/ECF Electronic Filing The Honorable J. Mark Coulson **United States District Court** For the District of Maryland 101 West Lombard Street Baltimore, MD 21201

> Re: Belois Craven v. Walmart, Inc.

> > Civil No.: 1:24-cy-01936-EA

Dear Judge Coulson:

In accordance with your August 8, 2024 order scheduling the settlement conference for this matter on November 18, 2024, please accept this letter on behalf of Defendant Walmart, Inc. ("Defendant" or "Walmart") requesting that Defendant's representative be excused from appearance at the settlement conference. This request is made with consent of Brandon James, Esquire, counsel for Plaintiff.

Walmart is a corporation that is self-insured in this case. As such, no insurance adjusters or insurance representatives are involved. Walmart's corporate representative overseeing this case is Bradley Lewis, Esquire, an in-house attorney for Walmart who resides in Arkansas and works in Walmart's corporate headquarters located in Bentonville, Arkansas. Undersigned counsel affirms that she will have complete, unfettered settlement authority, to negotiate and resolve this matter without the presence of Walmart's representative at the Settlement Conference. Nevertheless, to the extent Walmart's in-house attorney would be needed to participate in any manner during the Settlement Conference, he will be available by telephone from Arkansas such that the Court and all parties can be assured that there shall be no hindrance to any potential settlement negotiations whatsoever during the Settlement Conference.

Undersigned counsel further affirms that prior to the Settlement Conference, Walmart's representative will be fully briefed on all factual and legal issues involved in this case, to include an appreciation for the Maryland-specific law and procedure applicable to this matter, such that Walmart's corporate representative will be able to make an informed decision as to the extent of authority authorized prior to the Settlement Conference as well as any further decision-making necessitated during the Settlement Conference.

Finally, based upon the facts and allegations contained in Plaintiff's Complaint, as well as undersigned counsel's initial investigation, this matter is expected to be a straightforward tort case and is not expected to involve any complicated factual or legal issues. For all of these reasons, no party, nor the Court, will be prejudiced by excusing Walmart's representative from the Settlement Conference. Accordingly, for good cause shown, Defendant respectfully requests that this Honorable Court excuse Defendant's representative from the Settlement Conference.

I look forward to working with you at the settlement conference. Thank you.

Very truly yours,

Kelly S. Kylis

Kelly S. Kylis, Esquire